

002-27



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JOSE SEMORILE, JR.,

Plaintiff,

-against-

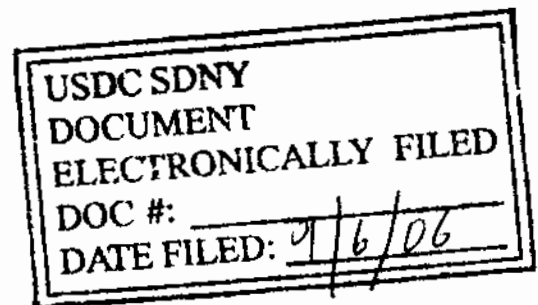
CITY OF NEW YORK, SERVICE EMPLOYEE
INTERNATIONAL UNION LOCAL 300 AFL-CIO,
DAVID TWEEDY, individually and in his official
Capacity as Acting Commissioner of the NYC DEP,
EDWARD WELCH, individually and in his official
Capacity as Chief of the NYC DEP Police Department,
FRANK MILAZZO, individually and in his official
Capacity as Captain of the NYC DEP Police Department,
And JAMES GOLDEN, individually,

Defendants.

MEMO ENDORSED

Case No. 05 CY 7261

NOTICE OF MOTION



PLEASE TAKE NOTICE, that Defendants, SERVICE EMPLOYEES
INTERNATIONAL UNION LOCAL 300 AFL-CIO (LOCAL 300) and JAMES
GOLDEN (Golden), will move this Court at the United States Courthouse at 500 Pearl
Street, New York, NY 10007, for an order, pursuant to Local Civil Rule 1.4 allowing
substitution of Mirkin & Gordon, P.C., attorneys for Defendants SEIU Local 300 and
JAMES GOLDEN by Addabbo & Greenberg by Todd D. Greenberg, for the reasons set
forth in the accompanying Affirmations.

Responsive papers shall be filed with this Court and personally served upon the
undersigned no later than five (5) days prior to the hearing date set forth above. Any
responsive papers shall be in conformity with the Federal Rules of the Civil Procedure

SO ORDERED

[Signature]
LEWIS A. KAPLAN, U.S. J.

and indicate the entity submitting the response, nature of the response and basis of the response.

Dated: Great Neck, NY
November 1, 2005

Respectfully submitted,



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